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Attorneys for Plaintiff LAUREN SMITH, individual, on behalf of herself and others  
similarly situated  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

**Ludmila Gulkarov, Janine Torrence,  
Kelly McKeon, and Josh Crawford,**

Plaintiffs,

v.

**PLUM, PBC, and  
PLUM, INC.**

Defendants.

) Case No. 4:21-CV-00913-YGR

) **NOTICE OF RELATED CASE  
PURSUANT TO CIVIL L.R. 3-12;  
STIPULATION AND [PROPOSED]  
ORDER ON DESIGNATION OF  
RELATED CASES PURSUANT TO  
CIVIL L.R. 7-11**

) **Hon. Yvonne Gonzalez Rogers**

WHEREAS, Plaintiff Lauren Smith recently filed her complaint in *Smith v. Plum, PBC, et al.*, 4:21-cv-02519-HSG. Her proposed class action for economic loss involves plaintiffs who allege injuries after purchasing and/or consuming Defendants' baby food products. Defendants include the manufacturers of baby food products.

WHEREAS, five other putative consumer fraud class actions have been previously filed against Plum, PBC and two personal injury claims have been filed

against various baby food manufacturers arising from the purchase and/or consumption of baby food products. They are listed in ascending order, starting with the lowest case number:

- *Gulkarov v. Plum, Inc., et al.*, 4:21-cv-00913-YGR (Judge Rogers) (filed 2/5/21)
- *McKeon, et al. v. Plum, PBC*, 4:21-cv-01113-YGR (Judge Rogers) (filed 2/15/21)
- *AG, et al. v. Plum, PBC, et al.*, 4:21-cv-01600-YGR (Judge Rogers) (filed 3/5/21)
- *Mathiesen v. Plum, PBC*, 21-cv-01763 (Judge Rogers) (filed 3/12/21)
- *Pereira v. Campbell Soup Co.*, 21-cv-01767 (Judge Rogers) (filed 3/12/21)
- *Ellison v. Plum, PBC*, 21-cv-02015 (Judge Rogers)
- *IM v. Plum, PBC, et al.*, 3:21-cv-02066-TSH (Judge Rogers) (filed 3/24/21)

WHEREAS, the above seven actions have already been deemed administratively related by this Court.

WHEREAS, whenever a party knows or believes that an action may be related to an action which is or was pending in the Northern District, said party “must promptly file in the earliest-filed case an Administrative Motion to Consider Whether Cases Should Be Related, pursuant to Civil L.R. 7-11.”

NOW THEREFORE, Plaintiff Smith and all affected parties in the Related Actions hereby stipulate that:

1. The *Smith* action (4:21-cv-02519) currently pending in the Northern District of California should be administratively related to the *Gulkarov*, *Pereira*, *Mathieson*, *Ellison*, *McKeon*, *A.G.*, and *I.M.* cases currently pending before Judge Rogers.

**IT IS SO STIPULATED.**

Dated: April 15, 2021

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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Yvonne Gonzalez Rogers  
U.S. DISTRICT COURT JUDGE